## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

Chapter 11

FTX TRADING, LTD., et al.,

Case No. 22-11068 (KBO) (Jointly Administered)

Debtors.

Hearing Date: November 20, 2025 at 9:30 a.m. Objection Deadline: October 30, 2025 at 4:00 p.m. Reply Deadline: November 13, 2025 at 4:00 p.m.

FTX RECOVERY TRUST,

Plaintiff,

- against -

Adv. Pro. No. 24-50214 (KBO)

MANIFOLD MARKETS, INC., MANIFOLD FOR CHARITY, INC., ROSS RHEINGANS-YOO, and FTX PHILANTHROPY, INC.,

Defendants.

## **NOTICE OF MOTION FOR SANCTIONS**

TO: (a) the U.S. Trustee; (b) counsel to the FTX Recovery Trust; (c) the Securities and Exchange Commission; (d) the Internal Revenue Service; (e) the United States Department of Justice; (f) the United States Attorney for the District of Delaware; and (g) to the extent not listed herein, those parties requesting notice pursuant to Bankruptcy Rule 2002.

On September 26, 2025, Ross Rheingans-Yoo filed his *Motions for Sanctions Pursuant to Federal Rule of Bankruptcy Procedure 9011, 28 U.S.C. § 1927; and 11 U.S.C. § 105* (the "Motion").

Objections, if any, to the relief requested in the Motion must be filed with the United States Bankruptcy Court, 824 North Market Street, 3<sup>rd</sup> Floor, Wilmington, Delaware, 19801, on or before **October 30, 2025 at 4:00 p.m.** (ET).

At the same time, you must also serve a copy of the objection upon the undersigned counsel so as to be received no later than 4:00 p.m. (ET) on October 30, 2025.

A HEARING ON THE MOTION WILL BE HELD ON **NOVEMBER 20, 2025 at 9:30 a.m.** (**ET**) BEFORE THE HONORABLE KAREN B. OWENS, CHIEF UNITED STATES BANKRUPTCY JUDGE, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 6TH FLOOR, COURTROOM NO. 3, WILMINGTON, DELAWARE 19801.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: September 26, 2025 Wilmington, Delaware

## JOYCE, LLC

/s/ Michael J. Joyce

Michael J. Joyce (No. 4563) 1225 King Street, Suite 800 Wilmington, Delaware 19801 Telephone: (302) 388-1944 mjoyce@mjlawoffices.com

-and-

## **GOETZ PLATZER LLP**

Scott D. Simon (admitted *pro hac vice*) One Penn Plaza, Suite 3100 New York, New York 10119 Telephone: (212) 695-8100 ssimon@goetzplatzer.com

Counsel for Ross Rheingans-Yoo